

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**C. M. COLLINS, N. J. LUNDY and R.  
C. L. MAYS, individually and on behalf  
of all others similarly situated,**

*Plaintiffs,*

**VS.**

**CATASTROPHE RESPONSE UNIT,  
INC. and CATASTROPHE RESPONSE  
UNIT USA, INC.,**

***Defendants.***



**CIVIL ACTION NO. 4:22-cv-1073**

## **DEFENDANTS' DISCLOSURE STATEMENT**

**TO THE HONORABLE U.S. DISTRICT JUDGE SEAN D. JORDAN:**

Defendants Catastrophe Response Unit, Inc. and Catastrophe Response Unit USA, Inc.  
(collectively, “Defendants”) hereby file this Disclosure Statement.

## I.

Pursuant to Rule 7.1(a) of the Federal Rules of Civil Procedure, Defendants disclose the following:

- Catastrophe Response Unit, Inc. is a nongovernmental corporate party that has no parent corporation, and there is no publicly-held corporation owning 10% or more of its stock; and
- Catastrophe Response Unit USA, Inc. is a nongovernmental corporate party that has no parent corporation, and there is no publicly-held corporation owning 10% or more of its stock.

## II.

Defendants list as follows all persons, associations of persons, firms, partnerships, corporations, guarantors, insurers, affiliates, parent or subsidiary corporations, or other legal entities that are financially interested in the outcome of the case:

C. M. Collins  
3125 Kings Canyon Drive  
Plano, Texas 75025

*Plaintiff*

N. J. Lundy  
1414 Clubman Drive  
Champions Gate, Florida 33896

*Plaintiff*

R. C. L. Mays  
4131 Royal Banyan Drive, Unit 202  
Tampa, Florida 33610

*Plaintiff*

Kerry O'Brien  
O'BRIEN LAW FIRM  
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*Plaintiffs' counsel*

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*Plaintiffs' counsel*

Catastrophe Response Unit, Inc.  
2001 Sheppard Avenue East, Suite 810  
Toronto, Ontario M2J 4Z8

*Defendant*

Catastrophe Response Unit (USA), Inc.  
860 West Airport Freeway, Suite 400  
Hurst, Texas 76054

*Defendant*

Monte K. Hurst  
Kristen A. Brumbalow  
HALLETT & PERRIN, P.C.  
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*Defendants' Counsel*

Respectfully submitted,

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*Counsel for Defendants Catastrophe  
Response Unit, Inc. and Catastrophe  
Response Unit USA, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on February 24, 2023, I served a copy of the foregoing document on Plaintiffs' counsel as follows in compliance with Rule 5(b) of the Federal Rules of Civil Procedure:

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Monte K. Hurst  
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